

# EXHIBIT H





Bates No.	DATE	AUTHOR/ AFFILIATION	ADDRESSE	OTHER RECIPIENTS	DOCUMENT TYPE/DESCRIPTION	BASIS(ES) FOR WITHHOLDING
PRIV00000776-PRIV00000776	5/19/2021	Carol Nicolette, Esq./Travelers	Newkirk, Christopher D	Carol Nicolette, Esq.	E-mail from counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product;
PRIV00000778-PRIV00000778	7/19/2021	Carol Nicolette, Esq./Travelers	Newkirk, Christopher D		Draft letter with attorney comments and edits; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action and attorney work product	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product;
PRIV00000779-PRIV00000779	6/29/2021	Carol Nicolette, Esq./Travelers	Newkirk, Christopher D		Draft letter with attorney comments and edits; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action and attorney work product	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product;
PRIV00000780-PRIV00000780	9/20/2021	Newkirk, Christopher D/Travelers	Carol Nicolette, Esq.; Butler Clark, Jineki C	Johnson, Karen I; Fausey, Joy K; Newkirk, Christopher D	Post-disclaimer e-mail to/from counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action settlement in anticipation of coverage litigation	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product; Communications in Anticipation of Litigation; Material Prepared in Anticipation of Litigation
PRIV00000781-PRIV00000781	10/15/2021	Carol Nicolette, Esq./Travelers	Newkirk, Christopher D		Draft letter with attorney comments and edits; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action and attorney work product	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product; Communications in Anticipation of Litigation; Material Prepared in Anticipation of Litigation
PRIV00000782-PRIV00000782	12/9/2020	Carol Nicolette, Esq./Travelers	Newkirk, Christopher D	Carol Nicolette, Esq.	E-mail to counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product;
PRIV00000783-PRIV00000783	7/7/2021	Carol Nicolette, Esq./Travelers	Newkirk, Christopher D	Carol Nicolette, Esq.; Butler Clark, Jineki C; Johnson, Karen I; Fausey, Joy K	E-mail to counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product;
TRAV00002975-TRAV00002977	1/2022-11/2022	Newkirk, Christopher D/Travelers			Post-disclaimer internal claim reflecting confidential communications with counsel in anticipation of coverage litigation; confidential communications with counsel in connection with legal advice regarding mediation with Scholastic in anticipation of coverage litigation	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product; Communications in Anticipation of Litigation; Material Prepared in Anticipation of Litigation
TRAV00002977	12/14-16/2021	Newkirk, Christopher D/Travelers			Post-disclaimer internal claim note regarding confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding expert consultant in anticipation of coverage litigation	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product; Communications in Anticipation of Litigation; Material Prepared in Anticipation of Litigation
TRAV00002977	10/20-11/18/2021	Newkirk, Christopher D/Travelers			Post-disclaimer internal claim note regarding confidential communications with counsel; confidential communications with counsel in connection with legal advice in anticipation of coverage litigation	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product; Communications in Anticipation of Litigation; Material Prepared in Anticipation of Litigation
TRAV00002977-TRAV00002978	10/5-12/2021	Newkirk, Christopher D/Travelers			Post-disclaimer internal claim note regarding confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt settlement in anticipation of coverage litigation	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product; Communications in Anticipation of Litigation; Material Prepared in Anticipation of Litigation
TRAV00002978-TRAV00002979	9/22-23/2021	Newkirk, Christopher D/Travelers			Post-disclaimer internal claim note regarding confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action and expert consultant in anticipation of coverage litigation	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product; Communications in Anticipation of Litigation; Material Prepared in Anticipation of Litigation
TRAV00002979-TRAV00002980	8/12/2021	Newkirk, Christopher D/Travelers			Post-disclaimer internal claim note regarding confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt settlement in anticipation of coverage litigation	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product; Communications in Anticipation of Litigation; Material Prepared in Anticipation of Litigation
TRAV00002980-TRAV00002981	6/30/2021	Newkirk, Christopher D/Travelers			Internal claim note summarizing confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product
TRAV00002981-TRAV00002982	5/7-25/2021	Newkirk, Christopher D/Travelers			Internal claim note summarizing confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product
TRAV00002983	4/14/2021	Newkirk, Christopher D/Travelers			Internal claim note summarizing confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product
TRAV00002984	12/3/2020	Newkirk, Christopher D/Travelers			Internal claim note summarizing confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product
TRAV00002984	11/24/2020	Newkirk, Christopher D/Travelers			Internal claim note regarding confidential communications with counsel; confidential communications with counsel in connection with legal advice regarding Vanderbilt Action	Attorney-Client Communications; Attorney-Client Privilege; Attorney Work Product